UNITED STATES OF AMERICA

IN THE DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

JAMES LAFFERTY, DR. PAUL LOWINGER, JERRY TYLER, JAMES INGRAM, PROFESSOR WILLIAM ~~GOHLMAN~~, PROFESSOR NOAM CHOMSKY, PROFESSOR DAVID HERRESHOF, REVEREND JOE GIPSON, PROFESSOR HOWARD ZINN, PROFESSOR WILSON C. MCWILLIAMS, MARCUS RASKIN + RICHARD BARNETT

Plaintiffs,

-vs-

No: _____

WILLIAM ROGERS, Secretary of State for the United States; MELVIN LAIRD, Secretary of Defense for the United States; HENRY KISSINGER, Special Advisor to the President,

Defendants.

_____/

COMPLAINT FOR INJUNCTION

ABDEEN M. JABARA
Attorney for Plaintiffs

LAFFERTY, REOSTI, JABARA, PAPAKHIAN, JAMES, STICKGOLD, SMITH & SOBLE
726 Pallister Avenue
Detroit, Michigan 48202
875-3333 (area code 313)

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Defendants.

COMPLAINT FOR INJUNCTION

1. This action is brought under Section 3 of the Administrative Procedure Act, as amended by the Freedom of Information Act of July 4, 1967, 5 USC Sec 552(2)(3), and under the First Amendment of the United States Constitution, seeking preliminary and final injunction against withholding information from plaintiffs and ordering that it be disclosed.

2. Plaintiffs James Lafferty, Paul Lowinger, James Ingram and David Herreshoff are residents of the City of Detroit, Wayne County, Michigan. Plaintiff Jerry Tyler is a resident of the City of Seattle, King County, Washington. Plaintiff Noam Chomsky is a resident of the City of Lexington, Middlesex County, Massachusetts. Plaintiff Joe Gipson is a resident of

the City of Washington, District of Columbia. Plaintiff Howard Zinn is a resident of the City of Newton, Middlesex County, Massachusetts. Plaintiff Wilson Carey McWilliams is a resident of the City of Highland Park, Middlesex County, New Jersey. Plaintiff William Gohlman is a resident of the City of Berea, Cuyahoga County, Ohio.

3. Defendant William Rogers is the duly appointed Secretary of State for the United States. Defendant Melvin Laird is the duly appointed Secretary of Defense for the United States, and Defendant Henry Kissinger is the duly appointed Special Advisor on national security affairs to the President of the United States.

4. That on September 2, 1971, Plaintiff James Lafferty, by and through his attorney, directed a formal written request by registered post to the named Defendants requesting the production and transmittal to him of certain studies prepared by, at the request of, or with the assistance and cooperation of Defendants which, upon information and belief, concern the facts and circumstances surrounding increasing American involvement in the Middle East including contingency plans for the deployment of American armed forces personnel to the Middle East for unilateral American military action or joint action with the defense forces of a Middle Eastern nation, which studies are now in the possession of the Defendants. Defendants have not, as of the time of the filing of this action, produced and transmitted the requested studies to Plaintiff although Defendant Secretary of State, through his agent and employee, has responded that the study of Julius Holmes has been classified by Executive Order.

5. That said studies requested included, but were not limited to, a voluminous study prepared in 1967 and 1968 by Julius Holmes at the request of President Johnson; a study prepared in 1967 by McGeorge Bundy at the request of President Johnson; a study prepared by Rand Corporation pursuant to a request by Defendant Henry Kissinger concerning the circumstances in which American nuclear weapons might be used in the Middle East; numerous political studies of Rand Corporation conducted under the direction of Professor Sidney Alexander of the Massachusetts Institute of Technology, financed by the Ford Foundation; certain unpublished volumes of the so-called Pentagon papers; and such other studies unknown to Plaintiffs at this time detailing the extent of U.S. commitment in the Middle East and contingency plans for military involvement.

6. That Plaintiffs Paul Lowinger, Jerry Tyler, James Ingram, William Gohlman, Noam Chomsky, David Herreshoff, Joe Gipson, Howard Zinn, and Wilson McWilliams have spoken to and concurred with Plaintiff James Lafferty, personally and through his attorney, in the necessity of securing a full presentation of facts concerning the increasing involvement of the United States in the Middle East conflict and contingency plans for the deployment of American armed forces personnel into the area on behalf of any party, or the use of nuclear armaments, without full knowledge and consent to such deployment by the American public, and join Plaintiff Lafferty in his request for the production of these studies.

WHEREFORE, Plaintiffs pray that this court:

1. Issue a preliminary and a final injunction directing

defendants to cease from withholding from Plaintiffs the studies conducted by Julius Holmes, McGeorge Bundy and Rand Corporation, and such other studies by Defendants or their agents or employees, that involve contingency plans for the deployment of American armed forces personnel to the Middle East and/or the use of nuclear weapons in the area, and such other studies concerning the nature, extent and history of American involvement and commitment in the area.

2. Order defendants to make available to Plaintiffs such memorandums or studies involving contingency plans for the deployment of American armed forces personnel to the Middle East and/or the use of nuclear weapons in the area, and such other studies concerning the nature, extent and history of American involvement and commitment in the area.

3. In lieu thereof, supply Plaintiffs a statement of the reasons for the decision and determination of classification status, and a summary of the evidence before the defendant when it is so decided and determined.

4. Grant such other and further relief as to the Court seems proper.

LAFFERTY, REOSTI, JABARA, PAPAKHIAN,
JAMES, STICKGOLD, SMITH & SOBLE

BY Abdeen M. Jabara

ABDEEN M. JABARA
Attorney for Plaintiffs
726 Pallister
Detroit, Michigan 48202
Phone: 875-3333

Dated: October 7, 1971

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STATEMENT OF FACTS
AND
ARGUMENT

ABDEEN M. JABARA
Attorney for Plaintiffs

LAFFERTY, REOSTI, JABARA, PAPAKHIAN,
JAMES, STICKGOLD, SMITH & SOBLE
726 Pallister Avenue
Detroit, Michigan 48202
Phone: 875-3333

STATEMENT OF FACTS

On September 2, 1971, Plaintiff James Lafferty, one of the national coordinators for the National Peace Action Coalition, directed a letter to Secretary of State William Rogers, Secretary of Defense Melvin Laird, and Presidential Advisor Henry Kissinger requesting the transmittal to himself of studies concerning the extent of American involvement and commitment in the Middle East, stating that he was:

> desirous of securing a full presentation of all facts concerning U.S. involvement in the Middle East, short of jeopardizing national security, and is increasingly concerned that the policies pursued in the area on behalf of Israel by the last several U.S. administrations is leading toward the creation of a situation in the Middle East not unlike that now faced by the American people in Southeast Asia, involving the deployment of American military personnel to a situation for which the U.S. would bear much of the responsibility.

Specifically, Plaintiff requested transmittal to himself of specific studies as well as others dealing with contingency plans for American military intervention into the Middle East conflict.

The existence of plans for American military intervention and the request that they be made a matter of public record is based on several facts:

The first formal American commitment to intervene militarily in the Middle East can be found in the great power Tripartite Declaration by France, Britain and the United States of May 25, 1950, which guaranteed the 1948 armistice lines between Israel and the neighboring Arab states against any altera-

tion as de facto borders of Israel through the use of force. Department of State Bulletin, V22 (June 5, 1950), p. 886. The commitment contained in the Tripartite Declaration was made despite the fact that the armistice lines left the newly created state of Israel in military occupation of substantially more area than was allotted to it in the United Nation Partition Resolution of November 29, 1947, Quincy Wright, The Middle East Problem, A.J.I.L., Vol. 64, 1970, p. 277, which resolution was sponsored and promoted by the great powers, particularly the United States. Indeed, the U.S. played the key role in its passage after its defeat on the first ballot. Sumner Welles, We Need Not Fail, (Boston: Houghton Miflin 1948), p. 63; Walter Millis (Ed.), The Forrestal Diaries, (New York: Viking Press, 1951), p. 363. The area which Israel occupied after the conclusion of the Arab-Israeli armistice agreements was approximately one-third more area than contained in the United Nations Partition Resolution of November 29, 1947.

The Second announced formal American commitment to intervene militarily in the Middle East was the promulgation of the Eisenhower Doctrine in 1957. This Doctrine had specified that the United States was willing to come to the aid, militarily, of countries threatened by international Communism or "Communist subversion." It stated that:

> The United States is prepared to use armed force to assist any such [Middle Eastern] nation or group of nations requesting assistance against armed aggression from any country controlled by International Communism. Public Law 85-7, 85th Congress, 1st Session, H.J. Res. 117 (March 9, 1957).

This Doctrine was invoked by President Chamoun of Lebanon against

internal nationalist political opposition, and the Sixth Fleet was alerted and American marines took up positions in Beirut. John Campbell, Defense of the Middle East, pp. 144-145, (Praeger, 1961). The Doctrine undoubtedly reflected the cold war policies of that period and was eventually repudiated by the Arab countries.

On October 8, 1970, the New York Times, in a front page article, a copy of which is attached to this memorandum, disclosed, for the first time, the existence of joint U.S.-Israeli contingency plans which envisioned an American-backed Israeli military intervention into Jordan to insure that King Hussein would not be overthrown. This support of Israel as a "policeman" in the area has developed into full view with the promulgation of the Nixon Doctrine in Guam. In President Nixon's February 18, 1970, message to Congress on U.S. Foreign Policy for the 1970s, the President stated concerning this new Doctrine that:

> Its central thesis is that the United States will participate in the defense and development of allies and friends, but that America cannot -- and will not -- conceive all the plans, design all the programs, execute all the decisions and undertake all the defense of the free nations of the world. (National Diplomacy 1965-1970, May, 1970, p. 119, Congressional Quarterly.)

Further, this is in keeping with the 1968 Middle East Plank of the Republican Party which provided that: "Her [Israel's] forces must be kept at a commensurate strength both for her protection and to help keep the peace in the area." (Emphasis added.) National Republican Party Platform, 1968, p. 26, Republican National Committee, Washington, D.C.

This commitment to Israel has been largely unconditional. David Nes, a member of the U.S. Foreign Service for 26

years, has partially described the extent of this relationship. See attached article entitled, "A Very Special Relationship." Other indices of the relationship can be pointed to. Israeli fund-raising in the United States has enjoyed a tax-exempt and tax-deductible status as "charitable contributions." (Exemption Letters of U. S. Internal Revenue Service for United Palestine Appeal, United Israel Appeal and United Jewish Appeal. under 26 U.S.C.A. sec. 501(c)(3)) This has involved the unilateral transfer of no less than two billion U.S. dollars to Israel by private donors, all of which has been tax-exempt and tax deductible. American Jewish Yearbook, 1971. Israeli Government Development Bonds sold in the United States have been exempted from the Interest Equalization Tax to which foreign securities sold in the U. S. are subject. 26 U.S.C.A. 4916(a); Executive Order 11285, June 10, 1966, 31 F.R. 8211. For the period 1962 to 1969 the largest volume of classified arms sales by the U. S. to any nation has been to Israel. National Deilomacy, 1965-1970, supra p. 25.

Americans have been allowed to serve in the Israeli armed forces without fear of the loss of U. S. citizenship.

As early as August 1951, the United States, in the Treaty of Friendship, Commerce and Navigation, which was concluded with Israel, sought, in its 25 paragraphs, to promote large scale private American capital investment in the newly-created state. 5 UST 552, (1951).

Of this situation, the Honorable Christopher Mayhew, a Member of the British Parliament, at a lecture at the Church

Center for the United Nations under the joint sponsorship of Americans for Middle East Understanding and the Holy Land Center, has said:

> . . . Today, Israel can sustain herself without the aid of American troops. Today, to send arms, to give financial and diplomatic support is enough. Direct American intervention in the Middle East is unthinkable today. But then direct intervention in Vietnam was unthinkable in 1955. I visited Vietnam that year. Then you had in Vietnam a Westernized, anti-Communist tough little regime, well worth sending arms to, well worth sending money to, which was capable of sustaining itself without the help of American troops.
>
> Then the balance of power shifted against President Diem and the South Vietnamese. Then the United States was faced with this fearful problem, this fearful dilemma: whether to let her friend and ally go under, a friend and ally who, whether willingly or not, should be encouraged to be uncompromising, to reject a negotiating attitude toward its enemies, whether to let it go under or to take the other, more appalling course of going to the assistance of the regime with direct military intervention by the United States. . . .
>
> I must say that reading my New York Times, I see the same leaders of public opinion who helped drive the United States into disaster in Vietnam are helping to drive the United States to disaster again in the Middle East. "There is a good stout, anti-Communist little regime, Westernized, our friend, our ally," they say. "We've only got to send them Phantoms and they'll stave off the Communists" and so on. Recognition of a deadly similarity is growing in my mind." The Link, Published by Americans for Middle East Understanding, May-June, 1970, p. 6.

One such example is in the article by George W. Ball, former undersecretary of state in the Kennedy and Johnson administrations, which appeared in the New York Times Magazine of June 28, 1970. Ball states that the economic and strategic interests of the U.S. in the Middle East are of such importance that the U.S. must be prepared to intervene militarily. This

need for intervention, Balls states, could not arise at a worse time because the "tragedy of Vietnam" is that it has led the American people toward "pacifism and isolationism." Thus, Ball regards the task ahead is for the President to "educate" (sic) the American public that their interests in the area may necessitate the deployment of American military force to the area.

The existence of contingency plans for intervention is supported by the New York Times of September 20, 1971, in an article concerning the possibility of renewed hostilities in the Middle East and the expected U.S. reaction to any Russian involvement in flying combat aircraft against Israeli superiority in the air vis-a-vis the Egyptians. Beecher states:

> American planners say the United States would consider sending American-manned Phantom fighters and Hawk missile battalions to help protect Israeli airspace, much as the Russians have done in Egypt.

On August 8, 1969, Newsday newspaper, which was published by the former Press Secretary of President Johnson, Bill Moyers, reported the possible existence of a Rand Corporation study, commissioned by Presidential Advisor, Henry Kissinger, on "the circumstances in which American neuclear weapons might be used in the Middle East." Prior to that, Army magazine of April 1968, on page 21, reported that representatives of the Departments of State, Defense and Treasury, including the various intelligence branches, participated in its preparation. This article was also written by New York Times correspondent, William Beecher.

It has been reported that President Johnson, in the days immediately following the June 1967 war requested that McGeorge Bundy, former advisor to Presidents Johnson and Kennedy on

national security affairs, form a consultative committee to study the question of "security" in the Middle East. His report was submitted to President Johnson and is believed to have been classified. Also, at the request of the U.S. government, numerous studies have been conducted by Rand Corporation and Resources for the future under the direction of Professor Sidney Alexander of M.I.T. Only a few of these have been made available to the public.

All of the available information cited above that certain contingency plans for the deployment of American military personnel to the Middle East either unilaterally or in joint American-Israeli action constitute unannounced commitments which Plaintiffs, as deeply concerned Americans, and the American public generally are legitimately entitled to be informed and apprised of. The concern and interest of the general public has been unequivocally demonstrated in several national polls of public opinion. In a national poll of 864 students on over 100 college campuses representing a cross section of the nation's 7,000,000 full-time college population, which was stratified geographically and by population, and used established professional public opinion techniques, students were asked whether the U.S. should continue to back Israel at the time the poll was conducted (1969), and 60 percent answered "No" while 6 percent were undecided. In the event of an armed conflict, 50 percent were against supplying Israel with additional arms and 28 percent were undecided. The College Poll, Greenwich College Research Center, Greenwich, Conn. An equally important poll of public opinion on this subject was a Time magazine-Louis Harris poll which appeared in Time magazine

on May 2, 1969, pp. 16-17. Only 9 percent of those sampled believed that the U.S. should go so far as to send in troops on behalf of Israel, and then only if Israel were in danger of being overrun. "Clearly," Harris observed, "the American people are not prepared to make to Israel anything like the commitment that we have made to South Vietnam."

Additionally, in two recent congressional polls in Illinois, of those asked: "Should the U.S. increase the sales of planes and armaments to Israel?" only a minority approved such sales, and when queried: "If the existence of Israel becomes threatened, should we go to its aid with our own military forces?" 10,655 replied "No," 1,294 had "No Opinion," and only 2,793 answered "Yes." (Congressional Record, September 17 and September 21, 1970, E8278 and E8397). A March 1970 Gallup Poll supports the contention that the vast majority of Americans desire a neutral stance in the Middle East with no deep unilateral commitments to any party. New York Times, March 19, 1970.

Plaintiffs in this action feel that the U.S. government has never opened the spectrum of U.S. interests and commitments in the Middle East to general public debate although the course of these interests and commitments has been the subject of comprehensive study, including contingency plans for military intervention, of which the American people are unaware, and opposed to.

ARGUMENT

This is an action brought under the Freedom of Information Act, amending Section 3 of the Administrative Procedure Act, and under the First Amendment of the United States Constitution. The purpose of the Freedom of Information Act was to provide a true federal public records statute by requiring the availability, to any member of the public, of all the executive branch records except those described within nine stated exemptions. House Report No. 1497, prepared to accompany Senate Bill 1160, 2 U.S. Code Congressional and Administrative News, 89th Congress, Second Session (1960) p. 2418. Its prime purpose was to elucidate the availability of government records and actions to the American citizen. American Mail Line, Ltd v. Gulick (1969) 133 App. D.C. 382, 411 F2d 696, 7ALR Fed. 840.

Under the Act, if the agency refuses to produce identifiable records, as in the instant fact situation, the aggrieved person or persons are given the right by Section 552(a)(3) to file an action, and the District Court is required to conduct a hearing on the complaint and determine the matter de novo. This de novo review under the Act extends to records which the governmental agency claims falls within a specific exemption. American Mail Line, Ltd. v. Gulick, supra. This extends to whether, and the extent to which, the conditions exist as claimed by the agency to support its decision to withhold records. Epstein v. Resor, 296 F Supp. 214 (N.D. Cal.), aff'd 421 F2d 930 (9th Cir. 1969), cert. denied, 398 U.S. 965 (1970). In the Epstein case the Court

took the logical position that since the legislative purpose of the Act was to make it easier for private citizens to secure government information, it seemed most unlikely that it was intended to foreclose a judicial review of the circumstances of the exemption, but rather that Sec. 552(a)(4)(b) was intended to specify the basis for withholding and that a judicial review de novo with the burden of proof on the agency should be had as to whether the conditions of the exemption in truth exist.

In the instant case, Defendant Secretary of State has responded that the voluminous study by Julius Holmes is classified by executive Order 10501, 3CF.R. 280 (1970) as requiring protection in the interests of national defense. Defendant does not know the whereabouts of the Bundy or Kissinger studies and states that the Alexander studies are available to the public.

With regard to the classification of the Holmes study, the holding of the Court in Epstein avails this Court of the power to determine whether the classification is arbitrary, unreasonable and unnecessary in light of the public policy and First Amendment considerations involved. The District Court in Epstein said:

> Otherwise, the agencies could easily frustrate the purpose of full disclosure intended by Congress merely by labeling the information to fall within the exemption [to 5 U.S.C., Sec. 552]. 296 F Supp. at 217.

While Executive Order 10501, supra, setting forth a system of classifying government documents lacks statutory or constitutional authorization, we are not claiming here that the Executive does not have the power, being charged with national security and the conduct of foreign relations, to classify. What is claimed

here is that classification must not be capricious under the circumstances. The Executive Order itself cautions against over-classification in its first paragraph:

> WHEREAS it is essential that the citizens of the United States be informed concerning the activities of their government.

but in Sections 16 and 18 of the Order, sets up its own system of review.

Indeed, the information sought in this action is not such that it "requires protection in the interests of national defense" pursuant to the criteria for classification under the Order, but rather that it is in the national interest to make the information public. Plaintiffs contend that these secret studies concerning the history, nature and extent of American involvement, commitments, including contingency plans for intervention, known and unknown, are a legitimate matter of public debate and concern since the pursuit of particular foreign policy can involve the American people in conflicts abroad which are not in the national or public interest.

On April 20, 1970, addressing 1,500 people at the annual luncheon session of the Associated Press in New York, Defendant Secretary of Defense stated: "Let me emphasize my convictions that the American people have a right to know even more than has been available in the past about matters which affect their safety and security. There has been too much classification in this country." Lloyd Shearer, What Price Security, Detroit Free Press, Parade Magazine, August 22, 1971, p. 5.

In testifying before the Foreign Operations and Government Information subcommittee of the House of Representatives on

June 23, 1971, former Supreme Court Justice and U.S. Ambassador to the United Nations, Arthur J. Goldberg, stated:

> . . . I have read and prepared countless thousands of classified documents and participated in classifying some of them. In my experience, 75 percent of these should never have been classified in the first place, another 15 percent quickly outlived the need for secrecy; and only about 10 percent genuinely required restricted access over any significant period of time. Floyd Shearer, supra, p. 5.

William G. Florence, a retired Pentagon security expert, helped during the Eisenhower Administration to write the original document (Executive Order 10501) which sets up the classification system and defines top secret, secret, and confidential. He has stated:

> Only one-half of one percent of all the information currently classified top secret, secret, and confidential, deserves such protection. The other 99.5 percent could easily be made public.
>
> In my 43 years of military and civilian service with the government involving responsibility for safeguarding defense information, I discovered widespread disorientation at all levels concerning the purpose and meaning of Executive Order 10501.
>
> The Defense Department has incorrectly imposed alll kinds of classification restrictions on the press, its own employees, and government contractors. The basic classification system was originally designed for the very narrow field of military information that could be used by some foreign nation against the United States.
>
> Now, however, it's become a way of life, and it's used as a cover-up for all sorts of governmental inadequacy and failure, and these rightly should be made public. Lloyd Shearer, supra, p. 7.

The passage of the Freedom of Information Act can be interpreted as the result of increasing concern with governmental secrecy and the "right to know" as a basic right secured by the

First Amendment. While Congress has made no law by which the executive privilege is being exercised in the instant fact situation, the extent to which that privilege may be exercised against the importance of free and open debate and discussion in a democratic society has been a proper consideration for the courts. United States v. Reynolds, 345 U.S.1, anno. 97L Ed. 727 (1953).

In Reynolds an action was commenced under the Federal Tort Claims Act for compensation for the death of civilians in a military accident. Plaintiff sought the production of the accident report under Rule 43 of the Federal Rules of Civil Procedure. On appeal from a ruling for Plaintiff, while the Supreme Court held that a court does not automatically have the right to look at such documents in camera when there is a reasonable danger that they would contain military secrets, the Court also stated at pages 9 and 10 of 345 U.S.

> judicial control over the evidence of a case cannot be abdicated to the caprice of executive officers.

If there were a greater need to see the withheld documents, the court might have to probe more, the Court stated. In the instant case there has been no claim by the Defendant Secretary of State that the Holmes study contains military secrets, and if there had been a claim, it would be a bald assertion of a fact which Plaintiffs cannot contest because Defendant refuses to disclose the documents in question.

Moreover, the very question of what constitutes national defense is itself a matter of fact and judicial control.

In a criminal trial under the Federal Espionage Act the

appellate court held that the defendant had a right to a jury trial on the question of whether or not classified documents, in fact related to national defense and that it was not merely a question of how the documents were marked or classified. United States v. Drummond, 354 F 2d 132 (2d Cir. 1965) cert. denied 384 U.S. 1013 (1966).

That the courts have the power to review executive actions, even emergency actions, for possible misuse has been recognized. "The Executive has broad discretion in determining when the public emergency is such as to give rise to the necessity of martial law . . . executive action is not proof of its own necessity, but a judicial question." Duncan v. Kahanamokv, 327 U.S. 304, Stone concurring at 336 (1946).

No showing has been made, and, indeed, none can be, that the security of the United States will in any way be jeopardized or exposed by the production of any one or all of the sutdies on the Middle East which are the subject of this suit. Moreover, any argument of security by the government is far outweighted by the right and need of the public to know what its government is doing and committing this country to. "The principle bases of democracy are knowledge and discussion." James v. Opeliker, 316 U.S. 584, 62 S. Ct. 1231, vacated on other grounds. (1942) The Department of Justice has, in previous matters, taken the position that in withholding information the Executive is accountable only to the electorate (Statement of Norbert Schlei, Assistant Attorney General, Hearings Before the Subcommittee on Administrative Practice and Procedure of the Senate Judiciary

Committee on S1160, S1336, S. 1758, and S1879, 89th Cong. 1st Sess. 192205 (1965). The speciousness of this argument can readily be comprehended when one asks how the public can be in a position to judge or vote without knowing the facts withheld.

Judge Gurfein recognized this principle in his opinion in the Times Vietnam Papers case, at p. 328 F. Supp. 324 (1971).

> Yet, in the last analysis, it is not merely the opinion of the editorial writer, or of the columnist which is protected by the First Amendment. It is the free flow of information so that the public will be informed about the Government and its actions.

In the concurring opinion of Justice Douglas, joined by Justice Black, in the Times-Post case, 91 S. Ct. 2140 (1971), while that was a case involving prior restraint, it was stated on page 2146 that:

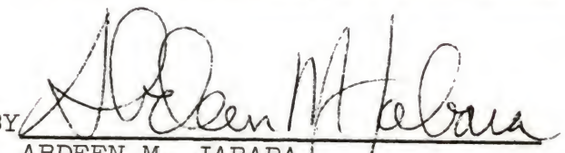
> The dominant purpose of the First Amendment was to prohibit the widespread practice of governmental suppression of embarrassing information. It is common knowledge that the First Amendment was adopted against the widespread use of the common law of seditious libel to punish the dissemination of material that is embarrassing to the powers-that-be . . . A debate of large proportions goes on in the nation over our posture in Vietnam. That debate antedated the disclosure of the contents of the present documents. The latter are highly relevant to the debate in progress.

Since an informed public is an essential component to a viable democratic system, employing a form of censorship by the government can only smack of a serious discrepancy between the principles of the nation, on the one hand, and the actions of its government on the other. Robust debate can only take place in a forum where the public possesses the knowledge and information to make that debate meaningful. Moreover, since the citizenry of this country must, in the last analysis, be held responsible for the actions of its elected government, both at home and in

its conduct and involvement abroad, it is doubly imperative that the citizenry might request an accounting now of actions which it will be called on to support physically, morally, politically and materially in the future.

Respectfully submitted,

LAFFERTY, REOSTI, JABARA, PAPAKHIAN,
JAMES, STICKGOLD, SMITH & SOBLE

BY 

ABDEEN M. JABARA
Attorney for Plaintiffs
726 Pallister
Detroit, Michigan 48202
Phone: 875-3333

Dated: October 7, 1971